

1 Joseph E. Addiego III (CA SBN 169522)  
2 Frederick A. Haist (CA SBN 211322)  
3 DAVIS WRIGHT TREMAINE LLP  
4 505 Montgomery Street, Suite 800  
5 San Francisco, California 94111  
Telephone: (415) 276-6500  
Facsimile: (415) 276-6599  
Email: joeaddiego@dwt.com  
frederickhaist@dwt.com

6 Attorneys for JPMorgan Chase Bank, N.A.

7  
8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10 Mary Valdez,  
11 Plaintiff,  
12  
13 v.  
14 J.P.Morgan Chase Bank, N.A.,  
15 Defendant.

Case No. 2:20-cv-02033-KJM-JDP

**FOURTH STIPULATION  
BETWEEN JPMORGAN CHASE  
BANK, N.A. AND MARY VALDEZ  
TO EXTEND CHASE'S TIME TO  
RESPOND TO THE COMPLAINT  
AND ORDER**

NEW RESPONSE DATE: March 19,  
2021

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1 Plaintiff Mary Valdez filed this action on October 12, 2020. Ms. Valdez  
2 served Defendant JPMorgan Chase Bank, N.A. on October 13, 2020, making  
3 Chase's response originally due on November 3, 2020. Based upon the allegations  
4 in the Complaint, Chase requested and Ms. Valdez initially granted Chase until  
5 December 1, 2020 to investigate the claims, evaluate early settlement, and  
6 determine its response to the Complaint, and granted another extension to January  
7 11, 2021 and again to February 12, 2021.

8 The parties have discussed settlement and believe that they are close to  
9 reaching a resolution that would eliminate the need for further filings and Court  
10 proceedings if Chase has additional time to respond to the Complaint.

11 The parties stipulate under Local Rule 144, with the Court's approval, that  
12 Chase's time to respond to the Complaint is extended 35 days to March 19, 2021.  
13 This is the fourth extension Ms. Valdez has granted to Chase. The extension will  
14 not affect any other date in the case, assuming the Court grants the parties'  
15 stipulated request to continue the current February 25, 2021 Status Conference and  
16 all related Rule 16 and 26 deadlines. That stipulation will be filed concurrently  
17 with the instant stipulation. In any event, the parties can conduct the Rule 26  
18 conference and draft and file the Status Report even if the court does not grant the  
19 other stipulation and even if Chase has not answered.

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IT IS SO STIPULATED.

DATED: February 5, 2021

Respectfully submitted,  
DAVIS WRIGHT TREMAINE LLP

By: /s/ Joseph E. Addiego III  
Joseph E. Addiego III  
Frederick A. Haist  
Attorneys for JPMorgan Chase Bank,  
N.A.

DATED: February 5, 2021

MARTIN & BONTRAGER, APC

By: /s/ G. Thomas Martin, III  
G. Thomas Martin, III  
Nicholas J. Bontrager  
Attorneys for Mary Valdez

**ORDER**

Defendant's time to respond to the Complaint is extended 35 days to  
March 19, 2021. This order resolves ECF No. 11.

IT IS SO ORDERED.

DATED: February 5, 2021

  
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CHIEF UNITED STATES DISTRICT JUDGE